

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS
prepared for
Multimedia Holdings Corporation
KUSA-DT Denver, Colorado
Facility ID 23074
Ch. 16 1000 kW 318 m

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of the analog television station KUSA-TV Channel 9, Denver, Colorado (BLCT-19900801KF). *Multimedia* has a construction permit for the paired digital television facility, KUSA-DT, Channel 16, Denver, Colorado (file number BPCDT-19980731LH). It has an application to modify the construction permit (file number BMPCDT-20000501ADN) which was returned to pending status on February 12, 2001 upon rescission of grant of a modified permit. The instant amendment revises the pending application to specify a new, nearby location which is the proposed “Lake Cedar Group” (“LCG”) shared antenna and antenna support structure facility.

A “reference” directional antenna pattern, DTV reference effective radiated power (“ERP”) and height above average terrain (“HAAT”) of 1000 kW and 280 meters, respectively, for KUSA-DT have been established under **Appendix B** of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268, FCC 98-315, released December 18, 1998, per §73.622(f)(1) of the Commission’s rules. The proposed KUSA-DT facility will operate with an ERP of 1000 kW ERP at an effective antenna height of 318 meters AAT. The proposed HAAT exceeds the allotted reference antenna height by more than 10 meters ERP. Accordingly, as required by §73.622(f)(5) of the Commission’s Rules, a study per §73.623(c) was conducted to evaluate interference to analog and DTV facilities that may be attributed to the proposed KUSA-DT facility.

A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and*

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Interference, July 2, 1997 (“OET-69”).³ The interference study examined the net change in interference as experienced by other stations that would result from the proposed facility (in lieu of the reference KUSA-DT). All stations considered in this study are listed in **Exhibit 41 - Table II**. The results of the interference study, also summarized in **Exhibit 41 - Table II**, indicate that any additional interference to these stations meets the Commission’s 2% / 10% interference limits to all pertinent NTSC and DTV stations and allotments.

There are no known Class A television stations or LPTV television stations known to be eligible for Class A status⁴ that would receive prohibited overlap from the proposed facility except KDEV-LP (Aurora, CO, Facility ID 29455, BLTTL-19940926JK). However, KDEV-LP was displaced from Channel 16 by the allotment of DTV Channel 16 for KUSA with the DTV Table of Allotments. KDEV has submitted an application for License for a Class A Facility on Channel 45 and has an application pending for Channel 39. Thus the instant proposal complies with the Commission’s protection requirements with respect to Class A stations and LPTV stations eligible for Class A status.

There are no known AM stations within 3.2 km of the proposed KUSA-DT facility. The nearest FCC monitoring station is 593.1 km distant at Grand Island, Nebraska. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3).

Table Mountain Radio Receiving Zone

The proposed KUSA-DT facility is within 50 kilometers of the Table Mountain Radio Receiving Zone, (“RRZ”). §73.1030 of the Commission’s Rules requires that consideration be given the need to protect such areas from “harmful” interference. However, the present VHF television stations in the Denver area, including KUSA-TV’s NTSC Ch. 9, were grandfathered with respect

³The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun computer) to the Commission’s implementation of OET-69 show excellent correlation.

⁴See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

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to protection of the *RRZ*. It has been suggested that since the existing facilities are “grandfathered” and that the Commission’s objective in allotting DTV power was to replicate the existing service, the paired DTV facilities should also be “grandfathered” with respect to the *RRZ* (See **Attachment 1** provided in KUSA-DT’s original application, BPCDT-199807071LH, Engineering Statement of John F.X. Browne & Associates regarding the “Table Mountain Radio Receiving Zone”). For the reasons cited herein, it is believed that this proposal should be deemed to be in compliance with the intent of the Commission’s requirements to protect the *RRZ*.

Exhibit 41 - Table II
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Multimedia Holdings Corporation
 KUSA-DT Denver, Colorado
 Facility ID 23074
 Ch. 16 1000 kW 318 m

DTV Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- (“2 percent” test)</u>		<u>Percentage Reduction of Baseline Population (“10 percent” test) (6)</u>
						<u>Population (4)</u>	<u>Percentage (5)</u>	
KTVJ-DT (CP)	Boulder, CO 15	6.6	2,095,000	2,169,455	2,154,030	15,425	0.74	0.00
KTVJ-DT (Ref)	Boulder, CO 15	6.6	2,095,000	2,086,488	2,066,952	19,536	0.93	1.34
KMGH-DT (CP)	Denver, CO 17	6.6	2,247,000	2,096,528	2,096,431	97	0.00	6.70
KMGH-DT (App)	Denver, CO 17	0.2	2,247,000	2,246,783	2,210,421	36,362	1.62	1.63
KMGH-DT (Ref)	Denver, CO 17	0.5	2,247,000	2,246,783	2,244,517	2,266	0.10	0.11
KPNE-DT (Ref)	North Platte, NE 16	374.9	66,000	65,928	65,928	0	0.00	0.11

Prepared August, 2002 by Mark B. Peabody

Cavell, Mertz & Davis, Inc.

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INTERFERENCE ANALYSIS RESULTS SUMMARY
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NTSC Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated “Before” Service Population (2)	Calculated “After” Service Population (3)	--- Net “New” Interference --- (“2 percent” test)		---Total Interference--- from DTV only (“10 percent” test)	
						Population (4)	Percentage (5)	Population (7)	Percentage (8)
KTVJ(TV) (CP Mod)	Boulder, CO 14	6.6	2,116,066	2,092,406	2,092,062	344	0.02	4,299	0.20
KTVJ(TV) (App)	Boulder, CO 14	6.6	2,187,212	2,164,901	2,164,660	241	0.01	1,848	0.08
New (App)	Scottsbluff, NE 16	262.5	55,532	54,316	54,310	6	0.01	1,158	2.09
960111LO (App)	Scottsbluff, NE 16	262.5	50,288	49,835	49835	0	0.00	353	0.70
KTVD(TV) (Lic)	Denver, CO 20	6.6	2,178,967	1,992,639	1,992,639	0	0.00	50,813	2.31
KTVD(TV) (CP)	Denver, CO 20	0.2	----- no interference predicted from proposal -----						

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INTERFERENCE ANALYSIS RESULTS SUMMARY
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- Notes:
- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour
 - (2) Service population after reduction from terrain and interference losses, before consideration of proposal
 - (3) Service population after reduction from terrain and interference losses, considering proposal
 - (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A number in parenthesis indicates a *reduction* in interference.
 - (5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
 - (6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).
 - (7) NTSC station total population subject to interference from DTV only sources (considering proposal)
 - (8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "*Additional Application Processing Guidelines for Digital Television*"